

## **EXHIBIT B**

**CASE NO. 2023-85306**

STARREX INTERNATIONAL LTD., § IN THE DISTRICT COURT OF  
STARREX INSURANCE HOLDINGS, INC., §  
STARREX HOLDINGS, INC., AND §  
STARREX INSURANCE SERVICES, INC. §  
§  
PLAINTIFFS, § HARRIS COUNTY, TEXAS  
V. §  
§  
COAST TO COAST TITLE, LLC, SOL §  
CITY TITLE, LLC, MAGNOLIA TITLE §  
ARKANSAS, LTD., AND MAGNOLIA §  
TITLE FLORIDA, LLC § 11TH JUDICIAL DISTRICT  
§  
DEFENDANTS. §

**DEFENDANTS' ORIGINAL ANSWER AND VERIFIED DENIAL**

Defendants Coast to Coast Title, LLC, Sol City Title, LLC, Magnolia Title Arkansas, Ltd., and Magnolia Title Florida, LLC (collectively "Defendants"), file their Original Answer and Verified Denial and respectfully show this court:

**I. GENERAL DENIAL**

1. Defendants herein generally deny each and every allegation of Plaintiffs' Original Petition and demand strict proof by a preponderance of the credible evidence, as required by the Texas Constitution, applicable Texas statutes and common law, and the Texas Rules of Civil Procedure.

**II. VERIFIED DENIAL**

2. Defendants further deny the authenticity of the signatures of the documents attached to Plaintiffs' Original Petition as Exhibits 1-8. Pursuant to Tex. R. Civ. P. 93(8), the signatures in the Revolving Promissory Note for Coast to Coast Title, LLC, the Revolving Promissory Note for Sol City Title, LLC, the Revolving Promissory Note for Magnolia Title Arkansas, Ltd., the Revolving Promissory Note for Magnolia Title Florida, LLC, the Promissory

Note Security Agreement for Coast to Coast, LLC, the Promissory Note Security Agreement for Sol City Title, LLC, the Promissory Note Security Agreement for Magnolia Title Arkansas, LLC, and the Promissory Note Security Agreement for Magnolia Title Florida, LLC were not authorized by John Magness. Defendants deny the genuineness of the purported signatures of these documents, nor were they authorized in any capacity.

### III. PRAYER

WHEREFORE, Defendants Coast to Coast Title, LLC, Sol City Title, LLC, Magnolia Title Arkansas, Ltd., and Magnolia Title Florida, LLC respectfully request that Plaintiffs take nothing on their claims against Defendants, that Defendants be awarded costs of Court and that the Court grant such other and further relief as the Court may deem proper or to which Defendants may be justly entitled.

Respectfully submitted,

**HENDERSHOT COWART, P.C.**

/s/ Simon W. Hendershot  
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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served on all parties through counsel of record pursuant to Rule 21a of the Texas Rules of Civil Procedure on January 5<sup>th</sup>, 2024.

*/s/ Simon W. Hendershot*

Simon W. Hendershot

Unofficial Copy Office of Marilyn Burgess District Clerk

**Automated Certificate of eService**

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Simon Hendershot on behalf of Simon W. Hendershot

Bar No. 9417200

trey@hchlawyers.com

Envelope ID: 83119200

Filing Code Description: Answer/ Response / Waiver

Filing Description: Defendants' Original Answer and Verified Denial

Status as of 1/5/2024 11:43 AM CST

**Case Contacts**

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Simon W. Hendershot		trey@hchlawyers.com	1/5/2024 11:24:33 AM	SENT

**CASE NO. 2023-85306**

STARREX INTERNATIONAL LTD.,  
STARREX INSURANCE HOLDINGS, INC.,  
STARREX HOLDINGS, INC., AND  
STARREX INSURANCE SERVICES, INC.

PLAINTIFFS,

v.

COAST TO COAST TITLE, LLC, SOL  
CITY TITLE, LLC, MAGNOLIA TITLE  
ARKANSAS, LTD., AND MAGNOLIA  
TITLE FLORIDA, LLC

DEFENDANTS.

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

11TH JUDICIAL DISTRICT

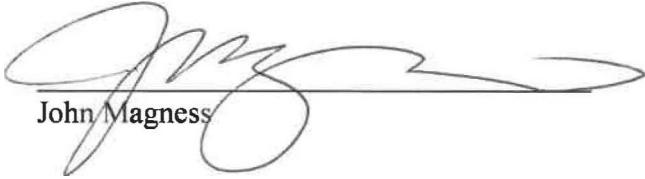
**VERIFICATION**

STATE OF TEXAS

COUNTY OF *Harris*

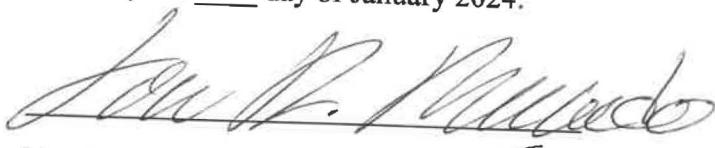
On this day, John Magness, individually, and as the President and CEO of Defendants Coast to Coast Title, LLC, Sol City Title, LLC, Magnolia Title Arkansas, Ltd., and Magnolia Title Florida, LLC, appeared before me, the undersigned notary public, and after being by me first duly sworn, stated that he has read the foregoing Original Answer and Verified Denial and the statements contained therein are within his personal knowledge and are true and correct.

The undersigned further denies the genuineness and authenticity of the signatures in the Revolving Promissory Note for Coast to Coast Title, LLC, the Revolving Promissory Note for Sol City Title, LLC, the Revolving Promissory Note for Magnolia Title Arkansas, Ltd., the Revolving Promissory Note for Magnolia Title Florida, LLC, the Promissory Note Security Agreement for Coast to Coast, LLC, the Promissory Note Security Agreement for Sol City Title, LLC, the Promissory Note Security Agreement for Magnolia Title Arkansas, LLC, and the Promissory Note Security Agreement for Magnolia Title Florida, LLC, attached as exhibits to Plaintiffs' Original Petition. The purported signatures of these documents are not genuine, nor were they authorized in any capacity.



John Magness

SUBSCRIBED AND SWORN TO before me, this 5<sup>th</sup> day of January 2024.



Notary Public in and for the State of Texas



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